

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**PHILIP WILKINSON and PAM
REED, individually and on behalf of a
class or classes of all others similarly
situated,**

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§
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Plaintiffs,

§
§

v.

Cause No. 3:11-cv-01115-N

§
§

**BDO USA, LLP, BDO International
Ltd., BDO Global Coordination B.V.,
and Brussels Worldwide Services
BVBA,**

§
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§
§

Defendants.

§

**NOTICE OF AGREED RESOLUTION
AND PROPOSED STIPULATED ORDER STAYING ALL DEADLINES**

WHEREAS, the parties have agreed, in principle, to resolve all matters in controversy between them;

WHEREAS, the parties are working diligently to document that resolution and to prepare and submit the papers necessary to seek court approval of that resolution; and

WHEREAS, the papers necessary to seek court approval of that resolution will be submitted to the Court as soon as they are finalized;

NOW, THEREFORE, upon consideration of the Notice of Agreed Resolution and Joint Stipulation of the parties; and

It appearing that good cause exists to enter this Stipulated Order, pursuant to Rule 16(b) of the Federal Rules of Civil Procedure, the Local Rules of this Court, and the Civil Justice Expense and Delay Reduction Plan for the Northern District of Texas;

It is hereby **ORDERED** that all deadlines, including, without limitation, Plaintiffs' deadline to respond to Defendants' Motions to Dismiss Plaintiff's First Amended Complaint, are hereby stayed until further order of this Court.

It is further **ORDERED** that the parties shall work diligently to finalize the agreed resolution and make their best efforts to submit documentation regarding the agreed resolution to the Court for approval on or before November 17, 2014. The parties may extend this deadline by agreement and without further Court order, but the parties must notify the Court of any such extension.

SIGNED _____, 2014.

David C. Godbey
UNITED STATES DISTRICT JUDGE

STIPULATED AND AGREED AS TO FORM AND SUBSTANCE:

<p><u>/s/ Douglas J. Buncher</u> Douglas J. Buncher Texas State Bar No. 03342700 dbuncher@neliganlaw.com Nicholas A. Foley Texas State Bar No. 07208620 nfoley@neliganlaw.com John D. Gaither Texas State Bar No. 24055516 jgaither@neliganlaw.com Douglas Dunn 325 N. S. Paul, Suite 3600 Dallas, Texas 75201 Telephone: (214) 840-5300 Facsimile: (214) 840-5301 <u>/s/ Edward C. Snyder</u> Edward C. Snyder Jesse R. Castillo CASTILLO SNYDER, P.C. 300 Convent Street, Suite 1020 San Antonio, Texas 78205 Telephone: (210) 630-4200 Fax: (210) 630-4210 Counsel for Plaintiffs and the Putative Classes</p>	<p><u>/s/ James R. Nelson</u> James R. Nelson State Bar No. 14899800 Grayson D. Stratton State Bar No. 24075443 Xenia Nicole Figueroa State Bar No. 24069716 DLA PIPER LLP (US) 1717 Main Street, Suite 4600 Dallas, TX 75201 Telephone: (214) 743-4500 Fax: (214) 743-4545 Michael S. Poulos (Of Counsel) Joseph E. Collins DLA PIPER LLP (US) 203 N. LaSalle St., Suite 1900 Chicago, Illinois 60601-1293 Telephone: (312) 368-4000 Fax: (312) 236-7516 Counsel for Defendants BDO USA, LLP, and BDO International Ltd.</p>
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